

Tennessee Department of Environment and Conservation
Division of Underground Storage Tanks
4th Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1541

July 10, 2003

Dear Tank Owner,

This is to make you aware of a change in the Division of Underground Storage Tank policy for allowing sump sensors to satisfy the requirement for pressurized piping line leak detection. At facilities where pressurized piping is used to convey product, sump sensors alone will no longer be acceptable to satisfy leak detection requirements.

In July 1999, the Division issued a revised Compliance Guidance Document, which indicated that ***under certain conditions*** sump sensors would satisfy both catastrophic and periodic leak detection requirements for pressurized piping. At the time, it was believed that the conditions placed on sump sensor use would ensure that this alternative method of line leak detection would be no less protective than what was required in the existing rules. In the ensuing years, the Division became increasingly aware that a change in this policy was needed. On July 2, 2003, the Division issued a Rule Interpretation Memo (RIM), which reversed the alternative allowance made in July 1999. The RIM can be found on the Division website at <http://www.state.tn.us/environment/ust/pdf/SumpSensors.pdf>.

As of July 15, 2003, if you use sump sensors for pressurized line leak detection, then you must also add a separate means of catastrophic line leak detection to all pressurized piping. If catastrophic line leak detection is not in use at your facility after that date, then the facility will not be in compliance with line leak detection requirements and you could face future enforcement actions. Catastrophic line leak detection may be achieved through the use of mechanical or electronic line leak detectors. If these detectors are not already in place, then you should contact your service company and arrange to add a means of catastrophic line leak detection to all pressurized piping.

You may continue to use sump sensors for monthly line leak detection, but only if certain conditions exist and you agree to perform certain routine practices. You will need to sign and notarize an affidavit if you wish to continue to use sump sensors for monthly line leak detection, otherwise you will need to employ another method of monthly line leak detection. The affidavit is on the Division website at <http://www.state.tn.us/environment/ust/pdf/SumpSensorsaffadavit.pdf>.

If you have questions about this change or need more information, call Lamar Bradley at (615) 532-0952, or call your local Environmental Assistance Center at 1-888 891-TDEC and ask for the Underground Storage Tank Compliance Inspector.

Sincerely,

Clinton W. Willer
Acting Director

Enclosures